

January 9, 2019

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MAR 01 2019

VIA REGULAR U.S. MAIL

EPA Pacific Southwest
San Francisco Office
75 Hawthorne Street
San Francisco, CA, 94105

Re: ***PUBLIC RECORDS REQUEST***

Danny/Debra Black vs. Allis-Chalmers Corp. Product Liability Trust
San Francisco Supr. Court Case No. CGC-17-276617
Client: Cleaver-Brooks, Inc.

Dear Custodian of Records:

Our office represents Cleaver-Brooks' Boilers in the above referenced matter. This is an asbestos-related lawsuit filed by Mr. Danny Black, who claims he was exposed to asbestos-containing materials when working at the CertainTeed Plant, located on 1014 Chesley Avenue, Richmond, CA 94804 during the mid-1960s. (hereinafter "CertainTeed"). Pursuant to the California Public Records Act, found at Government Code Sections 6250 *et seq.*, we ask for your assistance in locating documents and materials which may relate to this action. Specifically, we request that you please locate any and all copies of the following:

- Any and all documents and records relating to repair, maintenance, demolition, new construction, and addition work performed or to be performed at the CertainTeed from 1910 to 1987 to include bids, contracts, work orders, invoices, documents identifying building and construction materials, including asbestos materials, and documents identifying contractors, suppliers and of products and materials;
- Any and all records identifying the boilers that were installed or in operation at CertainTeed;
- Blueprints, construction drawings, architectural drawings, and building plans of the CertainTeed Plant, to include to new construction, remodel, and/or addition work;
- Any and all documents pertaining to CertainTeed's compliance with OSHA regulations;

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- Any asbestos abatement work that took place at CertainTeed from 1959 to 1970, and laboratory test results regarding the materials tested positive for asbestos and the locations at CertainTeed where such materials tested positive; and

The CertainTeed plant, which later, was sold and became Pabco. The plants no longer exist. The buildings were demolished several years ago.

If you have any questions or concerns, please do not hesitate to contact me. Thank you very much for your assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read 'IDT', with a long horizontal flourish extending to the right.

Iris D. Torres
Paralegal Coordinator

IDT:hmj